

## Message Text

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ACTION NEA-16

INFO OCT-01 ISO-00 L-03 SP-03 AID-20 EB-11 NSC-07 RSC-01

CIEP-03 TRSE-00 SS-20 STR-08 OMB-01 CEA-02 CIAE-00

COME-00 FRB-03 INR-11 NSAE-00 XMB-07 OPIC-12 LAB-06

SIL-01 AGR-20 SWF-02 DRC-01 /159 W

----- 127990

R 241340Z SEP 74

FM AMEMBASSY NEW DELHI

TO SECSTATE WASHDC 4091

LIMITED OFFICIAL USE NEW DELHI 12789

E. O. 11652: N/A

TAGS: PFOR, IN

SUBJECT: DOUBLE TAXATION TREATY

REF: (A) STATE 207588 (B) NEW DELHI 12659

1. WE WOULD BE PREPARED TO REVIVE THE ISSUE OF A  
DOUBLE TAXATION TREATY IF THE DEPARTMENT BELIEVES  
IT WOULD BE IN OUR INTEREST TO DO SO. AS WE RECALL,  
THIS WAS OUR IDEA IN THE FIRST PLACE. WHEN WE  
CONSIDERED IT FURTHER, WE TURNED UP SOME QUESTIONS  
WHICH THE DEPARTMENT MAY WANT TO CONSIDER IN DECIDING  
WHETHER TO GO AHEAD. THERE IS NOT MUCH AMERICAN  
INCOME BEING GENERATED IN INDIA AND WE ARE NOT SURE  
THAT SOME OF THE TAX PROBLEMS ENCOUNTERED ARE AMENABLE  
TO SOLUTION THROUGH AN INCOME TAX CONVENTION. AMERICAN  
TAXPAYERS CAN ALREADY CREDIT INDIAN INCOME TAXES IN  
ABOUT THE SAME WAY THEY COULD IF THERE WERE A CONVENTION.  
SINCE THERE ARE FAR MORE INDIANS WITH US SOURCE INCOME  
THAN THERE ARE AMERICANS WITH INDIAN SOURCE INCOME,  
THE ADVANTAGE OF THE EXCHANGE OF INFORMATION PRO-  
VISIONS OF THE CONVENTION MIGHT LIE MORE WITH THE  
INDIANS, BUT AS FAR AS WE KNOW, THE INDIANS AREN'T  
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ASKING FOR A CONVENTION, AND HAVEN'T BEEN SINCE IT

BECAME CLEAR WE COULD NOT INCLUDE AN INVESTMENT  
CREDIT IN ONE.

2. THERE MAY WELL BE MORE TO THIS THAN WE ARE AWARE  
OF HERE, HOWEVER, AND WE ARE CERTAINLY NOT AVERSE TO  
ADDING INDIA TO TREASURY'S WAITING LIST FOR NEGOTIATION  
OF A TAX TREATY IF WASHINGTON PERCEIVES ADVANTAGES.  
SCHNEIDER

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NNN

## Message Attributes

**Automatic Decaptioning:** X  
**Capture Date:** 01 JAN 1994  
**Channel Indicators:** n/a  
**Current Classification:** UNCLASSIFIED  
**Concepts:** POLICIES, AGREEMENTS, ORGANIZATION & MANAGEMENT, COMMITTEES, DOUBLE TAXATION  
**Control Number:** n/a  
**Copy:** SINGLE  
**Draft Date:** 24 SEP 1974  
**Decaption Date:** 01 JAN 1960  
**Decaption Note:**  
**Disposition Action:** RELEASED  
**Disposition Approved on Date:**  
**Disposition Authority:** izenbei0  
**Disposition Case Number:** n/a  
**Disposition Comment:** 25 YEAR REVIEW  
**Disposition Date:** 28 MAY 2004  
**Disposition Event:**  
**Disposition History:** n/a  
**Disposition Reason:**  
**Disposition Remarks:**  
**Document Number:** 1974NEWDE12789  
**Document Source:** CORE  
**Document Unique ID:** 00  
**Drafter:** n/a  
**Enclosure:** n/a  
**Executive Order:** N/A  
**Errors:** N/A  
**Film Number:** D740268-0748  
**From:** NEW DELHI  
**Handling Restrictions:** n/a  
**Image Path:**  
**ISecure:** 1  
**Legacy Key:** link1974/newtext/t19740919/aaaaapty.tel  
**Line Count:** 69  
**Locator:** TEXT ON-LINE, ON MICROFILM  
**Office:** ACTION NEA  
**Original Classification:** LIMITED OFFICIAL USE  
**Original Handling Restrictions:** n/a  
**Original Previous Classification:** n/a  
**Original Previous Handling Restrictions:** n/a  
**Page Count:** 2  
**Previous Channel Indicators:** n/a  
**Previous Classification:** LIMITED OFFICIAL USE  
**Previous Handling Restrictions:** n/a  
**Reference:** (A) STATE 207588 (B) NEW DELHI 12659  
**Review Action:** RELEASED, APPROVED  
**Review Authority:** izenbei0  
**Review Comment:** n/a  
**Review Content Flags:**  
**Review Date:** 16 AUG 2002  
**Review Event:**  
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30 JUN 2005

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**Review Release Date:** n/a  
**Review Release Event:** n/a  
**Review Transfer Date:**  
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**Secure:** OPEN  
**Status:** NATIVE  
**Subject:** DOUBLE TAXATION TREATY  
**TAGS:** PFOR, IN  
**To:** STATE  
**Type:** TE  
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